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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

DAN KEEFE,

Civil Action No. \_\_\_\_\_

Plaintiff,,

v.

**NOTICE OF REMOVAL**

NELSON, WATSON and ASSOCIATES,  
LLC.,

Defendant.

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TO: **The Clerk of the United States District Court for the District of Minnesota**

**Plaintiff, *Pro Se*, 6670 Mulberry Circle, Chanhassen, MN 55317.**

**PLEASE TAKE NOTICE** that defendant hereby removes the State Court action described below to this Court pursuant to 28 U.S.C. § 1331 and 1441, *et seq.* and respectfully states as follows:

1. Plaintiff, Dan Keefe (“Plaintiff”), commenced the action titled *Dan Keefe v. Nelson Watson and Associates, LLC*, in the Second Judicial District, Conciliation Court, Ramsey County, State of Minnesota. (See Exhibit A attached hereto, which constitute all process, pleadings and orders served upon Defendant in the State Court Action).

2. Plaintiff’s Complaint at Law alleges a violation of a federal statute, the Fair Debt Collection Practices Act (the “FDCPA”), 15 U.S.C. § 1692, *et seq.*

3. Defendant was served with the Summons and Complaint on January 31, 2011. (See Exhibit A attached hereto). No further proceedings have been had in the subject action. Accordingly, pursuant to 28 U.S.C. § 1446(b), this Notice of Removal was timely filed within thirty (30) days from when Defendant was served with the Complaint.

4. This action is removable pursuant to 28 U.S.C. § 1441 because it is a civil action of which this Court has original jurisdiction (based on federal question jurisdiction under 28 U.S.C. § 1331) and because Defendant is removing this action to the District Court of the United States for the district and division embracing the place where the action is pending.

5. This court has original jurisdiction of this civil action pursuant to 28 U.S.C. § 1331 because the action constitutes a claim by Plaintiff for violation of a federal statute. (See Exhibit A, Complaint, Plaintiff's Statement of Claim).

6. Pursuant to 28 U.S.C. § 1446(d), Defendant shall give plaintiff, its written notice of the filing of this Notice of Removal, and Defendant shall file the written notice of the filing of this Notice of Removal with the Clerk of the Second Judicial District, Conciliation Court Ramsey County, State of Minnesota, attaching thereto a copy of this Notice of Removal.

WHEREFORE, Defendant Nelson Watson and Associates, LLC gives notice that the matter styled as *Dan Keefe v. Nelson Watson and Associates, LLC*, which was pending in the Second Judicial District, Conciliation Court, Ramsey County, State of Minnesota, is removed to the United States District Court for the District of Minnesota.

Dated: February 28, 2011

Matt Mahoney  
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